

### **REMARKS**

The Office Action dated October 3, 2005, has been received and carefully noted. The above amendments to the claims and the following remarks are submitted as a full and complete response thereto.

Claims 1-30 have been cancelled. Claims 31-63 have been added to distinctly point out the invention. No new matter has been added, and no new issues are raised which require further consideration and/or search. Claims 31-63 are submitted for consideration.

The Office Action Summary page stated that claims 3, 6, 8, 13-16 and 23-30 were objected to. However, in the Detailed Action, the Office Action did not state the reasons of the objection. Furthermore, the Office Action Summary stated that this action is not final. However, page 10 of the Office Action states that the action is final. Applicant requests that the Examiner issue a new non-final Office Action that indicates the proper grounds of the objections and the proper status of the Office Action.

Claims 1, 10-11 and 21-22 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,796,727 to Harrison in view of U.S. Patent No. 6,243,581 to Jawanda. The Office Action stated that Harrison teaches all of the elements of the claimed invention except for "either an IDLE mode or ACTIVE mode while the mobile remains accessible to other devices without action by a user of the mobile" as recited in claims 1, 10 and 21. However, the Office Action cites Jawanda as curing these deficiencies and states that it would have been obvious to combine the teachings of

Harrison and Jawanda to yield the claimed invention.

Claim 2 was rejected under 35 U.S.C. 103(a) as being unpatentable over Harrison and Jawanda as applied to claims 1, 11 and 22 above, and in view of U.S. Patent No. 6,230,017 to Anderson. The Office Action stated that Harrison and Jawanda teach all of the elements of claim 2 except for attempting a location update via the WLAN and updating a new location of the mobile station at the MSC. However, the Office Action cites Anderson as curing these deficiencies and states that it would have been obvious to combine the teachings of Harrison, Jawanda and Anderson to yield the elements of claim 2.

Claims 5, 7 and 9 were rejected under 35 U.S.C. 103(a) as being unpatentable over Harrison and Jawanda as applied to claims 1, 11 and 22 above, and in view of U.S. Patent No. 6,424,638 to Ray. The Office Action stated that Harrison and Jawanda teach all of the elements of claims 5, 7 and 9 except for the mobile station measurement operations of GSM neighbor cells. However, the Office Action cites Ray as curing these deficiencies and states that it would have been obvious to combine the teachings of Harrison, Jawanda and Ray to yield the elements of claims 5, 7 and 9.

Claims 4 and 17-20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Harrison and Jawanda in view of Anderson as applied to claims 1, 11 and 22 above, and in view of Ray. The Office Action stated that Harrison, Jawanda and Anderson teach all of the elements of claims 4 and 17-20 except for the WMC informing GSM neighbor cells when the mobile station roams in IDLE mode and the mobile station selecting a

GSM radio and attempting a location update. However, the Office Action cites Ray as curing these deficiencies and states that it would have been obvious to combine the teachings of Harrison, Jawanda, Anderson and Ray to yield the elements of claims 4 and 17-20.

Claim 31, upon which claims 32-41 depend, recites an apparatus for a first telecommunication network, the apparatus including a data store to store a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network, to allow the cell of the first telecommunication network to be identified as a neighboring cell by a cell of the second telecommunication network.

Claim 42, upon which claims 43-48 depend, recites a handover module for proving seamless mobility between a first telecommunications network and a second telecommunication network, the module is arranged to receive cell identities from cells of the first telecommunications network and the second telecommunication network, wherein cell identities of cells from both the first telecommunications network and second telecommunication networks use the structure of the second telecommunication network. The module is also arranged to determine the need for changing serving cells and to initialize the process of changing a serving cell to another cell.

Claim 49, upon which claims 51-54 depend, recites a method for seamless mobility between a first telecommunication network and a second telecommunication network, the method including storing in the first telecommunication network a cell

identity information using a cell identity information structure of the second telecommunication network and transmitting the cell identity information to a mobile station.

Claim 55, upon which claims 56-63 depend, recites a mobile station comprising means for communicating with a first telecommunication network and a second telecommunication network and means for receiving a cell identity information for a cell of the first telecommunication network using a cell identity information structure of the second telecommunication network.

Harrison teaches a cellular system that is employed for the purpose of a wide area wireless LAN primarily to provide point to point links between a mobile station and mobile data service controller (MDSC) which communicates through a WAN or PSTN either to another MDSC or Wide Area Bridge (WAB). The WAB provides bridging between the WAN and an establishment LAN. Col. 5, lines 8-24. When a mobile station moves between an establishment environment where it has local wireless access to the LAN and a remote environment where it has wide area wireless access, the mobile station is envisaged to have a wireless modem which is capable of operation both as a cellular (outdoor) modem and a wireless LAN access (indoor) modem. Thus, as the mobile station moves from the outdoor environment to the indoor environment, communication will continue and there will come a point where the wireless LAN access modem can register with the indoor cell. Col. 11, lines 14-46.

Jawanda teaches a system that includes a wireless wide area network (WWAN) and a wireless local area network (WLAN) that are connected by an external network. Figure 4 of Jawanda shows a flowchart of a method of wireless data communication in which a data communication session is seamless handed off between the networks. A mobile terminal establishes a wireless connection with the WWAN. Datagrams may then be transferred between applications executed by the mobile terminal and applications execute by WLAN. The mobile terminal establishes a second wireless data connection by logging onto the WLAN. Thus, the user has concurrent wireless data connections with both the WWAN and WLAN. Then, a network access arbitrator causes the transfer of datagrams to be seamlessly handed off from the wireless connection with the WWAN to the wireless connection with the WLAN while maintaining the session applications. The network access arbitrator determines whether or not the transfer of datagrams should be handed off to the connection with the WWAN, for example, in response to the mobile terminal being moved out of range of the WLAN. If the data is to be handed off, a connection with WWAN is reestablished, if a connection is not already active. The data connection with WLAN can optionally be maintained until such times as the condition that prompted the connection is no longer present.

Anderson teaches that when a mobile station travels from an old cell to a new cell, handoff occurs and a location update operation must occur at both a HRL and a VLR. In this regard, when the mobile station travels to a new location, forced registration occurs

so that the HLR is updated with the mobile switching center that is now serving the mobile station.

Ray teaches that an Internet Gateway in a GSM network sends a list of potential target base station identities to a GSM MSC. Upon receiving the list, the GSM MSC sends a request to the mobile station asking the mobile station to transmit a measurement report from a neighboring cell back to the GSM base station. The GSM base station checks the measurement report for each potential target base station and selects the best target base station to perform handover. Col. 5, line 6-Col. 6, line 20.

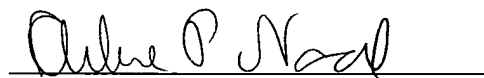
Applicant submits that the combinations of Harrison, Jawanda, Anderson, and Ray simply do not teach or suggest the combination of elements clearly recited in claims 31-63. Each of claims 31-63, in part, recites cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network. There is simply no teaching or suggestion in Harrison, Jawanda, Anderson, and Ray, alone or in combination, of cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network, as recited in claims 31-36. Therefore, Applicant respectfully asserts that the rejections under 35 U.S.C. §103(a) should be withdrawn because neither Harrison, Jawanda, Anderson, nor Ray, whether taken singly or combined, teaches or suggests each feature of claims 31, 42, 49 and 55 hence, dependent claims 32-41, 43-48, 50-54 and 56-63 thereon.

As noted previously, claims 31-63 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 31-63 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Petition for a Three-Month Extension of Time

Amendment Transmittal

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